

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

-against-

SCOTT A. FLANDERS,

Defendant.

Case No. 17-CR-2

Honorable Leonie M. Brinkema

Sentencing: April 21, 2017

**DEFENDANT'S UNOPPOSED MOTION TO SEAL PORTION OF HIS SENTENCING
MEMORANDUM**

Pursuant to Local Criminal Rule 49(E), the defendant, Scott A. Flanders, by counsel, moves for an Order sealing a portion of the document entitled "Position of the Defendant with Respect to Sentencing and 18 U.S.C. § 3553(a) Factors." Jack Hanly, Assistant United States Attorney, has consented to the relief sought herein.

A proposed Order is attached for the consideration of the Court.¹

Respectfully submitted,

April 14, 2017

/s/

A. Joseph Jay III (VSB No. 73067)
Kenneth L. Wainstein (*pro hac vice*)
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¹ The document to be sealed will be filed with the Court electronically with the information to be sealed redacted pursuant to Local Criminal Rule 49(E). An unredacted version of the document will be filed with Court non-electronically.

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2017, I will electronically file the foregoing document with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) to all counsel of record.

Pursuant to the Electronic Case Filing Policies and Procedures, a courtesy copy of the foregoing pleading will be delivered to Chambers within one business day of the electronic filing.

/s/
A. Joseph Jay III